

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARM LTD., a U.K. corporation,

Plaintiff,

v.

QUALCOMM INC., a Delaware corporation,
QUALCOMM TECHNOLOGIES, INC., a
Delaware corporation, and NUVIA, INC., a
Delaware corporation,

Defendants.

C.A. No. 22-1146-MN

PUBLIC REDACTED VERSION
(Filed July 22, 2024)

**DECLARATION OF NICHOLAS FUNG IN SUPPORT OF ARM LTD.'S
MOTIONS TO EXCLUDE AND STRIKE CERTAIN EXPERT OPINIONS OF MURALI
ANNAVARAM, PATRICK KENNEDY, JOHN COATES, AND JOEL STECKELARM**

VOLUME 3 OF 4 (EXHIBIT 6 – PART 2 OF 2)

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**HIGHLY CONFIDENTIAL –
ATTORENYS’ EYES ONLY – FILED
UNDER SEAL**

**DECLARATION OF NICHOLAS FUNG IN SUPPORT OF ARM LTD.’S
MOTIONS TO EXCLUDE AND STRIKE CERTAIN EXPERT OPINIONS OF MURALI
ANNAVARAM, PATRICK KENNEDY, JOHN COATES, AND JOEL STECKEL**

I, Nicholas Fung, declare as follows:

1. I am an attorney with the law firm of Morrison & Foerster LLP (“Morrison & Foerster”), counsel for Plaintiff Arm Ltd. (“Arm”) in the above-referenced action.
2. I submit this declaration in support of Arm’s Motions to Exclude the Expert Opinions of Murali Annavaram, Patrick Kennedy, John Coates, and Joel Steckel.
3. Attached hereto as **Exhibit 1** is a true and correct copy of the Opening Expert Report of Dr. Robert Colwell, dated December 20, 2023.
4. Attached hereto as **Exhibit 2** is a true and correct copy of the Opening Expert Report of Dr. Mike Chen, dated December 20, 2023.
5. Attached hereto as **Exhibit 3** is a true and correct copy of the Opening Expert Report of Mr. Todd Schoettelkotte, dated December 20, 2023.
6. Attached hereto as **Exhibit 4** is a true and correct copy of the Opening Expert Report of Mr. Guhan Subramanian, dated December 20, 2023.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the Opening Expert Report of Dr. Ravi Dhar, dated December 20, 2023.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the Opening Expert Report of Dr. Murali Annavaram, dated December 20, 2023.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the Rebuttal Expert Report of Dr. Murali Annavaram, dated February 27, 2024.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the Rebuttal Expert Report of Dr. Patrick Kennedy, dated February 27, 2024.

11. Attached hereto as **Exhibit 9** is an excerpt of a true and correct copy of the deposition transcript of John Coates, taken on April 19, 2024.

12. Attached hereto as **Exhibit 10** is a true and correct copy of the Expert Rebuttal Report of Mr. John Coates, dated February 27, 2024.

13. Attached hereto as **Exhibit 11** is a true and correct copy of the Expert Rebuttal Report of Dr. Joel Steckel, dated February 27, 2024.

14. Attached hereto as **Exhibit 12** is a true and correct copy of the Reply Expert Report of Dr. Murali Annavaram, dated March 25, 2024.

15. Attached hereto as **Exhibit 13** is a true and correct copy of the Opening Expert Report of Dr. Patrick Kennedy, dated May 20, 2024.

16. Attached hereto as **Exhibit 14** is an excerpt of a true and correct copy of the deposition transcript of Dr. Murali Annavaram, taken on June 27, 2024.

17. Attached hereto as **Exhibit 15** is an excerpt of a true and correct copy of the deposition transcript of Dr. Robert Colwell, taken on June 28, 2024.

18. Attached hereto as **Exhibit 16** is a true and correct copy of the Reply Expert Report of Mr. Todd Schoettelkotte, dated June 10, 2024.

19. Attached hereto as **Exhibit 17** is a true and correct copy of the Reply Expert Report of Mr. Guhan Subramanian, dated March 25, 2024.

20. Attached hereto as **Exhibit 18** is a true and correct copy of an email exchange from June 2021 and November 2022, with the subject line “[REDACTED],” produced by Defendants with Bates number QCARM_7434227.

21. Attached hereto as **Exhibit 19** is a true and correct copy of an email exchange from May 2021, with the subject line “[REDACTED],” produced by Defendants with Bates number QCARM_3535535.

22. Attached hereto as **Exhibit 20** is a true and correct copy of the Expert Reply Report of Dr. Patrick Kennedy, dated June 24, 2024.

23. Attached hereto as **Exhibit 21** is a true and correct copy of an email exchange from July 2021, with the subject line “Follow up,” produced by Arm with Bates numbers ARM_01305785 to - ARM_01305789.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 10th day of July, 2024 at Los Angeles, California.

/s/ Nicholas Fung
Nicholas Fung

Exhibit 6 (Part 2 of 2)

**REDACTED IN ITS
ENTIRETY**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 10, 2024, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

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